

1 JOSHUA HILL, JR. (CA SBN 250842)
JHill@mofo.com
2 DINA ROUMIANTSEVA (CA SBN 300576)
DRoumiantseva@mofo.com
3 JOSHUA A. KORR (CA SBN 304577)
JKorr@mofo.com
4 MORRISON & FOERSTER LLP
425 Market Street
5 San Francisco, California 94105-2482
Telephone: 415.268.7000
6 Facsimile: 415.268.7522

7 Attorneys for Defendant
SHARON RINGGENBERG
8

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 OAKLAND DIVISION
12

13 UNITED STATES OF AMERICA,
14 Plaintiff,
15 v.
16 SHARON RINGGENBERG,
17 Defendants.
18

Case No. CR 17-00191-JST-2

**STIPULATION AND
~~PROPOSED~~ ORDER
ALLOWING DEFENDANT
SHARON RINGGENBERG TO
TRAVEL**

19 Defendant, Sharon Ringgenberg, by her counsel Morrison & Foerster LLP, and the United
20 States, by its counsel Assistant United States Attorney Colin Sampson, hereby stipulate and agree
21 that defendant may travel out of the Northern District of California in order to attend a family
22 gathering and trip on a Disney Fantasy Cruise and to Disney World starting May 10, 2019
23 through May 21, 2019. Due to health reasons, Ms. Ringgenberg's sister and brother-in-law have
24 invited her on this trip and are paying for her attendance.

25 The group will depart out of San Francisco International Airport and arrive in Orlando,
26 Florida, in the Middle District of Florida on Friday, May 10, 2019, and will return to San
27 Francisco International Airport on Tuesday, May 21, 2019. On May 11, 2019, the family will
28 board a Disney Fantasy Cruise ship in Port Canaveral, Florida, which will travel in the Western

1 Caribbean for seven days with port calls at Cozumel/Grand Cayman/Falmouth, Jamaica, and
2 Castaway Cay in the Bahamas. The family will return to Orlando, Florida on Friday, May 18,
3 2019 to spend three days at Disney World, also in Orlando Florida until Tuesday, May 21, 2019.
4 The parties agree that Ms. Ringgenberg's passport may be released from pretrial services so that
5 Ms. Ringgenberg may apply for renewal of her expiring passport in advance of the planned travel.
6 Ms. Ringgenberg will surrender the renewed passport to pretrial services within 72 hours of
7 returning to the Northern District of California.

8 Ms. Ringgenberg has advised her pretrial services officer, Brad Wilson, of her itinerary,
9 and he does not object. Counsel for the government agrees that the above-described travel may be
10 taken by defendant on the condition that it not interfere with her participation at trial, which is
11 currently scheduled to be concluded before the proposed travel.

12
13 Dated: February 1, 2019

/s/ Joshua Hill

JOSHUA HILL, JR.

Attorney for Defendant Sharon Ringgenberg

14
15
16 Dated: February 1, 2019

/s/ Colin Sampson

COLIN SAMPSON

Assistant United States Attorney

ORDER

Based on the stipulation between the parties in this case, and good cause showing, IT IS ORDERED that Defendant Sharon Ringgenberg may travel out of the Northern District of California to the Middle District of Florida and Mexico, the Cayman Islands, Jamaica and the Bahamas by ship, from May 10, 2019 through May 21, 2019. Pretrial Services shall release Ms. Ringgenberg's passport so that she may apply for renewal of her passport in advance of the travel. Ms. Ringgenberg shall surrender any renewed U.S. passport to Pretrial Services, which shall release the passport to her no more than one week before the May 10, 2019 travel. Ms. Ringgenberg will surrender her passport to pretrial services within 72 hours of her return from the Northern District of California. Should any change in trial schedule occur, the parties are ordered to submit a status report or stipulation related to its impact on the proposed travel.

IT IS SO ORDERED.

Dated: February 4, 2019


THE HONORABLE JON S. TIGAR
UNITED STATES DISTRICT JUDGE